

THE HONORABLE RICARDO S. MARTINEZ

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

SECTRA COMMUNICATIONS AB,

Plaintiff,

v.

ABSOLUTE SOFTWARE, INC. and
NETMOTION SOFTWARE, INC.,
Defendants.

Case No. 2:22-cv-0353-RSM

**STIPULATION AND ORDER
REGARDING NOTING DATE AND
BRIEFING FOR DEFENDANT
NETMOTION SOFTWARE, INC.'S
MOTION FOR LEAVE TO AMEND
COUNTERCLAIM**

NOTE ON MOTION CALENDAR:

SEPTEMBER 30, 2022

1 The parties to the above-captioned action (the “Parties”), submit the below stipulation
 2 pursuant to Civil Local Rule 7(*l*) for review and approval by the Court:

3 **WHEREAS**, the Parties have engaged in good-faith meet-and-confer discussions
 4 regarding the need for jurisdictional discovery in connection with Defendant NetMotion
 5 Software Inc.’s (“NetMotion”) Motion for Leave to Amend (Dkt. No. 99) (the “Motion for
 6 Leave”);

7 **WHEREAS**, Plaintiff Sectra Communications AB (“Sectra”) filed a declaration from
 8 Sectra, Inc. employee Tobias Englund in support of Sectra’s opposition to the Motion for Leave
 9 (Dkt. No. 102-1);

10 **WHEREAS**, Sectra has agreed to make its declarant Tobias Englund available for
 11 deposition;

12 **WHEREAS**, NetMotion has filed a Motion to Seek Jurisdictional Discovery (Dkt. No.
 13 109) (the “Motion for Jurisdictional Discovery”), with a noting date of October 7, 2022;

14 **WHEREAS**, Sectra intends to oppose NetMotion’s Motion for Jurisdictional Discovery;

15 **WHEREAS**, jurisdictional discovery, if allowed, may impact the deposition of Mr.
 16 Englund;

17 **WHEREAS**, Mr. Englund’s deposition, and jurisdictional discovery if allowed, may be
 18 relevant to NetMotion’s pending Motion for Leave;

19 **WHEREAS**, to allow time for the Court to consider NetMotion’s Motion for
 20 Jurisdictional Discovery before the deposition of Mr. Englund, the Parties agree that the Noting
 21 Date on NetMotion’s Motion for Leave should be extended to November 18, 2022; and

22 **WHEREAS**, to address any relevance of jurisdictional discovery and the Englund
 23 deposition on NetMotion’s Motion for Leave, NetMotion may file a 6-page supplemental reply
 24 brief in support of the Motion for Leave by November 14, 2022 and Sectra may file a 6-page sur-
 25 reply brief in opposition to the Motion for Leave by November 18, 2022.

THEREFORE, the Parties hereby **STIPULATE** that the noting date on Defendant NetMotion Software Inc.'s motion for leave to amend be extended to November 18, 2022; that NetMotion be granted leave to file a 6-page supplemental reply brief in support of the motion for leave to amend by November 14, 2022; and that Sectra be granted leave to file a 6-page sur-reply brief in opposition to the motion for leave to amend by November 18, 2022.

SO STIPULATED.

DATED this 30th day of September, 2022

Respectfully submitted,

COOLEY LLP

/s/ Christopher B. Durbin
Christopher B. Durbin (WSBA #41159)
COOLEY LLP
1700 Seventh Avenue
Suite 1900
Seattle, WA 98101-1355
Tel: (206) 452-8700
Fax: (206) 452-8800
Email: cdurbin@cooley.com

Heidi L. Keefe (*pro hac vice* pending)
Reuben H. Chen (*pro hac vice* pending)
Alexandra Leeper (*pro hac vice* pending)
3175 Hanover St.
Palo Alto, CA 94304-1130
Tel: (650) 843-5000
Fax: (650) 849-7400
Email: hkeefe@cooley.com
Email: rchen@cooley.com
Email: aleeper@cooley.com

Attorneys for Defendants
ABSOLUTE SOFTWARE, INC. and NETMOTION SOFTWARE, INC.,

CORR CRONIN LLP

/s/ William R. Squires III

William R. Squires III, WSBA No. 4976
1001 Fourth Avenue, Suite 3900
Seattle, Washington 98154-1051
Telephone: (206) 625-8600
Fax: (206) 625-0900
Email: rsquires@corrchronin.com

MCDERMOTT WILL & EMERY

Stephen M. Hash (*pro hac vice*)
Kevin J. Meek (*pro hac vice*)
Syed K. Fareed (*pro hac vice*)
Samoneh Schickel (*pro hac vice*)
101 Congress Avenue, Suite 500
Austin, TX 78701-4076
Tel.: (512) 322-2587
Fax: (512) 322-3687
Email: shash@mwe.com
Email: kmeek@mwe.com
Email: sfareed@mwe.com
Email: sschickel@mwe.com

Attorneys for Plaintiff
SECTRA COMMUNICATIONS AB

IT IS SO ORDERED.

DATED this 3rd day of October, 2022.



RICARDO S. MARTINEZ
UNITED STATES DISTRICT JUDGE